

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MIDLAND FUNDING LLC

Plaintiff/Counterclaim Defendant,
vs.

ANDREA L. BRENT

Defendant/Counterclaim Plaintiff
vs.

**MIDLAND CREDIT MANAGEMENT,
INC.**

Counterclaim Defendant

Case No. 3:08-CV-1434

Judge David A. Katz

**UNOPPOSED MOTION TO EXTEND
DEADLINE TO FILE CLASS
CERTIFICATION MOTION**

Defendant, Andrea Brent, hereby moves this Court for an Order extending the deadline for the submission of her Motion for Class Certification in this case. Pursuant to a Case Management Conference held with this Court on December 15, 2009, Brent's Motion for Class Certification is to be filed by January 29, 2010.

Brent has requested leave to file an amended counterclaim which changes the description of the class members she seeks to represent. However, Brent's motion to amend has been opposed by Midland. Brent's reply brief, in response to Midland's opposition, will be filed on or before February 1, 2010, when it is due. Until this Court makes a determination on Brent's motion for leave to amend the counterclaim, the description of the class is uncertain.

Accordingly, Brent requests an Order allowing for thirty days, from the time of the decision regarding her Motion for Leave to File a Third Amended Counterclaim, in which to file her Motion for Class Certification.

Counsel for the Midland parties has been contacted and consents to this extension.

The undersigned certifies that this Motion is not made for purposes of delay and that the requested extension will not prejudice the parties.

Respectfully submitted,

/s/Dennis E. Murray, Sr.

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CERTIFICATION

This is to certify that a copy of the foregoing **Unopposed Motion To Extend Deadline To File Class Certification Motion** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic system. Parties may access the filing through the Court's system on this 28th day of January, 2010.

/s/Dennis E. Murray, Sr.

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Attorneys for Defendant/Counterclaim Plaintiff